

KRIS J. KRAUS

California State Bar No. 233699

FEDERAL DEFENDERS OF SAN DIEGO, INC.

225 Broadway, Suite 900

San Diego, California 92101-5008

Telephone: (619) 234-8467

Kris_Kraus@fd.org

Attorneys for Mr. Fabian Guerrero-Alvarez

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

((HONORABLE DANA M. SABRAW))

UNITED STATES OF AMERICA,

Plaintiff,

v.

FABIAN GUERRERO-ALAVAREZ,

Defendant.

CASE NO. 07CR2967-DMS

MOTION FOR AN ORDER RELEASING
CRIMINAL HISTORY DOCUMENTS

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY;
MARK CONNOVER, ASSISTANT UNITED STATES ATTORNEY; AND
JENNIFER L. CARREON, UNITED STATES PROBATION OFFICER:

Mr. Guerrero-Alvarez respectfully requests an order granting the production of all documents relied upon by United States Probation in determining his alleged prior criminal history and law enforcement contacts. The requested documents are necessary in determining whether the information in the pre-sentence report is correct.

Respectfully submitted,

/s/ Kris J. Kraus

DATED: January 22, 2007

KRIS J. KRAUS

Federal Defenders of San Diego, Inc.

Attorneys for Mr. Fabian Guerrero-Alvarez

CERTIFICATE OF SERVICE

Counsel for Defendant certifies that the foregoing pleading is true and accurate to the best of her information and belief, and that a copy of the foregoing document has been served this day upon:

Mark Conover
U S Attorneys Office Southern District of California
Criminal Division
880 Front Street
Room 6293
San Diego, CA 92101
(619)557-5610
Fax: (619)235-2757
Email: mark.conover@usdoj.gov

A copy was served by electronic mail to:

Jennifer L. Carreon
United States Probation Officer
jennifercarreon/CASP/09/USCOURTS

Dated: January 22, 2008

/s/ Kris J. Kraus
KRIS J. KRAUS
Federal Defenders
225 Broadway, Suite 900
San Diego, CA 92101-5030
(619) 234-8467 (tel)
(619) 687-2666 (fax)
e-mail: kris_kraus@fd.org